

United States District Court

MAY - 2 2014

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Tania Karina Lopez
A206 727 650

YOB: 1989

Principal
United States

Case Number:

M-14-0869-M

Jamara Lee Castillo
A206 727 552

YOB: 1988

Co-Principal
United States

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about May 1, 2014 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Selvin Ernesto Euceda-Chavez, citizen and national of Honduras, along with four (4) other undocumented aliens, for a total of five (5), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location in Los Ebanos, Texas to the point of arrest in Los Ebanos, Texas.

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On May 1, 2014, Border Patrol Agent (BPA) R. Martinez was operating the Aerostat camera system in Los Ebanos, Texas. At approximately 3:00 p.m., he observed several suspected illegal aliens emerge from a brushy area and enter a red sedan. This area is approximately 50 meters north of the Rio Grande River and is frequently utilized by alien and narcotic smugglers. BPA Martinez relayed his observation to the agents in the surrounding area. BPA R. Escobar responded and immediately observed a vehicle matching the description. BPA Escobar observed two passengers in the rear seat attempting to conceal themselves by slouching very low. He also noticed the driver, later identified as Tania Karina LOPEZ, was driving erratically by crossing the white line on the road multiple times. BPA Escobar proceeded to conduct a vehicle stop on the Chevrolet Malibu for an immigration inspection. The driver, LOPEZ, was determined to be a United States Citizen and the two passengers were determined to be undocumented aliens illegally present in the United States.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved to File

Grady Leopold, AUSA

Sworn to before me and subscribed in my presence,

May 2, 2014
Date

8:53 am at

Peter E. Ormsby, U. S. Magistrate Judge
Name and Title of Judicial Officer
Signature of ComplainantRicardo Ibanez Senior Patrol Agent
Printed Name of ComplainantMcAllen, Texas
City and State
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

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M-14-0869-M

**RE: Tania Karina Lopez
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BPA J. Garcia and M. Benavides were near the vehicle stop and noticed a maroon Chevrolet HHR suddenly stop near a house located on El Faro Road. Agents observed two subjects exit the vehicle and begin to run in an attempt to flee. Due to the circumstance of the vehicle stop, Agents approached the area suspecting the subjects may also be undocumented aliens. Agents were able to detain the fleeing subjects and determined they were illegally present in the United States. A passenger remained in the vehicle and it was determined that he was also illegally present in the United States. The driver, Jamara Lee CASTILLO, was also in the vehicle and claimed to be a United States Citizen. Both drivers were then taken into custody along with the five undocumented aliens for questioning.

After conducting interviews, Agents determined that both vehicles were associated to each other. CASTILLO granted Agents consent to search her phone which revealed a phone call between CATILLO and LOPEZ prior to their arrest. Both subjects were identified by one material witness in this case.

PRINCIPAL STATEMENTS:

1. Tania Karina LOPEZ was read her Miranda Rights and she stated she understood. After her rights were read, LOPEZ stated she and Jamara Lee CASTILLO were working together smuggling aliens. She later stated she did not want to answer any questions without an attorney present and all questions were ceased.

Records checks revealed LOPEZ was arrested after picking up 1 alien from a harboring location that contained 10 undocumented aliens on May 14, 2013. On April 6, 2010, she was a passenger for a 2 on 1 administrative alien smuggling case at the Falfurrias, Texas Checkpoint. On February 26, 2007, she was the driver for a 1 on 4 administrative alien smuggling case. She was not prosecuted on any of these cases.

2. Jamara Lee CASTILLO was advised of her Miranda Rights and was willing to provide a sworn statement without the presence of an attorney.

CASTILLO stated her friend Tania, had initially picked up all the illegal aliens. She further stated Tania called her so they could meet to transfer some of the aliens into her car. After they spoke, they met in Los Ebanos where she picked up threee aliens from Tania. As they drove out of the area, Tania was stopped by Border Patrol Agents. CASTILLO stated she decided to drop off the aliens at the same location where they had originally met. She was subsequently arrested after dropping the aliens off at that original location. CASTILLO added she was going be paid for transporting the aliens, but was unaware at this point of the amount. CASTILLO further stated she has been arrested once before for transporting illegal aliens but was not prosecuted. CASTILLO identified Tania Karina Lopez as the person who picked up the illegal aliens.

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MATERIAL WITNESS STATEMENT:

Once at the Border Patrol Station, Selvin Ernesto EUCEDA-Chavez was advised of his Miranda Rights. He understood his rights and provided a statement without the presence of an attorney.

EUCEDA stated that he made smuggling arrangements in Reynosa, Mexico and was going to pay \$3,000 once he arrived to Houston, Texas. On May 1, 2014, the group he was smuggled by raft into the United States. Once in the U.S., they followed a foot guide for approximately 20 minutes and he advised a maroon vehicle was going to pick them up. Once they saw this vehicle, the driver waved them down and instructed them to get inside and lay down. EUCEDA identified Tania Karina LOPEZ as the female that initially picked them up. Tania Karina Lopez then drove for approximately two minutes and stopped next to another vehicle. Lopez then instructed three of them to get off and get into the other vehicle. EUCEDA identified Jamara Lee CASTILLO as the female driver of the second vehicle. CASTILLO drove for about one or two minutes and then yelled at them "get out of my vehicle and go hide in the brush". They were arrested shortly after by Border Patrol.